

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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BRITTANY E. MARTIN,

Plaintiff,

Case No. 1:24-cv-00072

v.

HENN LESPERANCE PLC., *et al.*,

HON. Hala Y. Jarbou

Defendants.

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**CERTIFICATE OF ATTEMPT TO OBTAIN CONCURRENCE**

I hereby certify that I made the following efforts to confer in good faith with Defendants' counsel in an attempt to resolve the need for an enlargement of word-count without the necessity of seeking the Court's intervention.

On July 1, 2024, at 7:00 AM EST, Ms. Martin emailed Defendants' counsel—Mr. Lee Silver, Mr. Michael Gutierrez, Mr. Daniel Hatch, and Mr. Tyler Burk—seeking concurrence on her motion to exceed the word count limit and to ascertain whether Defendants would oppose it. This email detailed the need for additional words due to the extensive nature of Defendants' nearly 1,000 contested paragraphs and exhibits. (See Emails at ECF No. 85-1, PageID.1836-1839).

Mr. Hatch's response at 8:08 AM EST requested a phone conference to discuss the motion. Mr. Hatch claimed he was unavailable all-day Monday and all of Tuesday, but could make time on Wednesday, July 3, outside of 10 AM-12 PM. He was fully aware that Ms. Martin's response was due on Friday, July 5, and that Thursday was a court holiday.

Ms. Martin agreed to a phone conference at 12:30 PM on Wednesday, July 3, even though it conflicted with her family holiday plans.

CERTIFICATE OF CONCURRENCE

The email outlined the reasons for the requested extension, demonstrated that good cause exists, and included a proposed stipulated order for their review and signature. (See **EXHIBIT A** as email correspondence and attached proposed stipulated order).

Despite my efforts to obtain Defendants' concurrence for an enlargement of word-count without having to resort to court intervention, Defendants' refused to grant concurrence. When I inquired if that meant Defendants would oppose the motion, Defendants' counsel confirmed that it was very likely that Defendants would oppose the motion Respectfully submitted,

Brittany E. Martin  
*Plaintiff*

Dated: July 11, 2024

By: /s/ Brittany E. Martin  
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Se**  
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